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## *Co-Chair Common Benefit Fee and Cost Committee*

UNITED STATES DISTRICT COURT

## DISTRICT OF ARIZONA

## In Re Bard IVC Filters Products Liability Litigation

No. MD-15-02641-PHX-DGC

**MOTION TO FILE UNDER SEAL**

**(Filed *Ex Parte*)**

Plaintiffs' Co-Lead Counsel and Liaison Counsel to the Common Benefit Fee and Cost Committee and the Co-Chairs of the Common Benefit Fee and Cost Committee respectfully move this Court, pursuant to Federal Rule of Civil Procedure 26(c)(1)(G) and Local Civil Rule 5.6 for leave to file under seal Plaintiffs' Revised Motion for Interim Reimbursement of Shared Costs Limited to Capital Contributions ("Revised Motion for Interim Reimbursement") and the Proposed Scheduling Order: Common Benefit Fees and Expense Reimbursement ("Proposed Scheduling Order").

The Revised Motion for Interim Reimbursement and Proposed Scheduling Order contain confidential financial information relating to all Participating Counsel as defined in Case Management Order No. 6 (Doc. 372). Furthermore, as the Court is undoubtedly

1 aware, all filings related to the Common Benefit Fee and Cost Committee have been filed  
2 under seal in this litigation. Accordingly, good cause exists for sealing the Exhibit.

3 RESPECTFULLY SUBMITTED this 26<sup>th</sup> day of March 2021.

4 BEUS GILBERT MCGRODER PLLC

5 By:/s/ Mark S. O'Connor

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 26<sup>th</sup> day of March 2021, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jessica Gallentine